



U.S. Department of Justice

United States Attorney
Southern District of New York

The Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278

July 25, 2024

VIA ECF

The Honorable Laura Taylor Swain
Chief United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Tara Lucas, 24 Cr. 148 (LTS)*

Dear Chief Judge Swain:

The Government respectfully submits this letter to update the Court with respect to sentences that have been imposed in related cases since the filing of the Government's sentencing submission. An updated version of Exhibit A to the Government's submission is attached hereto.¹

Sincerely,

DAMIAN WILLIAMS
United States Attorney

by: _____ /s/
Jerry Fang / Jacob R. Fiddelman / Meredith Foster /
Catherine Ghosh / Sheb Swett
Assistant United States Attorneys
(212) 637-2584/-1024/-2310/-1114/-6522

cc: James Neuman, Esq.

¹ Exhibit A does not include the small number of cases in which the Government has agreed to a misdemeanor disposition.

EXHIBIT A
Felony Sentences Imposed on Related Defendants to Date

<u>Defendant</u>	<u>Docket</u>	<u>Date</u>	<u>Guidelines</u>	<u>Sentence</u>
Gibbs, Leroy*	22 Cr. 534 (CM)	2/8/23	27 to 33 months	33 months' imprisonment
Figueroa, Julio	22 Cr. 605 (DLC)	2/9/23	12 to 18 months	15 months' imprisonment
Rivera, John	24 Cr. 150 (DLC)	6/28/24	12 to 18 months	12 months and one day's imprisonment
Quetell, Eddie	24 Cr. 141 (VSB)	7/23/24	12 to 18 months	5 months' imprisonment
Escobar, Mauricio	24 Cr. 213 (JPO)	7/25/24	12 to 18 months	5 months' imprisonment
Hernandez, Jose	24 Cr. 156 (ALC)	7/25/24	30 to 37 months	19 months' imprisonment

* Gibbs's case involved an aggravating enhancement for obstruction of justice.